

Central Valley Regional Water Quality Control Board
4/5 June 2015 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
Tehama County Sanitation District No. 1
Mineral Wastewater Treatment Plant
Tehama County

At a public hearing scheduled for 4/5 June 2015, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0084069) for the Tehama County Sanitation District No. 1 (Discharger) Mineral Wastewater Treatment Plant (Facility). This document contains responses to written comments received from interested parties in response to the Tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 20 April 2015 in order to receive full consideration. Comments were received before the deadline from:

1. Central Valley Clean Water Association (CVCWA) (received 17 April 2015)

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

CENTRAL VALLEY CLEAN WATER ASSOCIATION (CVCWA) COMMENTS

CVCWA COMMENT #1 – Salinity Plan Requirement

CVCWA contends that because the Facility rarely discharges to surface water, it is unreasonable to require that a Salinity Evaluation and Minimization Plan (SEMP) be developed because of a “hypothetical impact to the Sacramento River that may occur once every several years.” CVCWA requests that the requirement for submittal of a SEMP be removed from the Tentative Order.

RESPONSE:

Central Valley Water Board Staff (Board Staff) agrees. CV-SALTS consulted with Board Staff on the matter and the Tentative Order has been modified to only require a SEMP should surface water discharge data or groundwater monitoring data become available that indicates receiving water quality objectives for salinity are threatened to be exceeded.

CVCWA COMMENT #2 – Collection System

CVCWA requests that permit language referencing the collection system (Section VI.C.5.c and Fact Sheet, Section VI.C.5.b) be modified so that it is clear that the collection system is regulated separately under State Water Board General Order 2006-0003-DWQ.

RESPONSE:

Board Staff agrees with CVCWA's request and has made the following changes to Section VI.C.5.c of the Tentative Order:

c. **Collection System.** On 2 May 2006, the State Water Board adopted State Water Resources Control Board Order No. 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems. The Discharger shall be subject to the requirements of Order No. 2006-0003-DWQ and any future revisions thereto. Order No. 2006-0003-DWQ requires that all public agencies that currently own or operate sanitary sewer systems apply for coverage under the general WDRs. The Discharger has applied for and has been approved for coverage under Order 2006-0003-DWQ for operation and maintenance of its wastewater collection system. The Discharger's collection system is part of the system that is subject to this Order. As such, the Discharger must properly operate and maintain its collection system (40 C.F.R. § 122.41(e)). The Discharger must report any non-compliance (40 C.F.R. § 122.41(l)(6) and (7)) and mitigate any discharge from the collection system in violation of this Order (40 C.F.R. § 122.41(d)). See the Order at Standard Provision VI.A.2.c and Attachment D, subsections I.D, V.E, V.H, and I.C.

Additionally, Water Board Staff has modified Fact Sheet, Section VI.C.5.b of the Tentative Order as follows:

b. The State Water Board issued General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order 2006-0003-DWQ (General Order) on May 2, 2006. The Monitoring and Reporting Requirements for the General Order were amended by Water Quality Order WQ 2008-0002-EXEC on February 20, 2008. The General Order requires public agencies that own or operate sanitary sewer systems with greater than one mile of pipes or sewer lines to enroll for coverage under the General Order. The General Order requires agencies to develop sanitary sewer management plans (SSMPs) and report all sanitary sewer overflows (SSOs), among other requirements and prohibitions.

Furthermore, the General Order contains requirements for operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. The Discharger is enrolled under the General Order. Inasmuch that the Discharger's collection system is part of the system that is subject to this Order, certain standard provisions are applicable as specified in Provisions, section VI.C.5. For instance, the 24-hour reporting requirements in this Order are not included in the General Order. The

~~Discharger must comply with both the General Order and this Order. The Discharger and public agencies that are discharging wastewater into the facility were required to obtain enrollment for regulation under the General Order by December 1, 2006.~~